FILED IN OPEN COURT
U.S.D.C. - Atlanta

DEC 23 2016

JAMES N. HATTEN, Clerk
By: Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA *v.* RANDY ERIC ASH	Criminal Action No. 1:16-MJ-1046

Government's Motion for Detention

The United States of America, by counsel, John A. Horn, United States Attorney, and Jennifer Keen, Assistant United States Attorney for the Northern District of Georgia, moves for detention under 18 U.S.C. §§ 3142(e) and (f).

1. Eligibility of Case

This case is eligible for a detention order because this case involves:

a crime of violence (18 U.S.C. § 3156);

an offense having a maximum sentence of life imprisonment or death; and

a serious risk that the defendant will flee.

2. Reason for Detention

The Court should detain defendant because there are no conditions of release that will reasonably assure the appearance of the person as required and the safety of any other person and the community.

3. Rebuttable Presumption

The United States will invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the appearance of the defendant as required and the safety of the community pursuant to 18 U.S.C. §

3142(e)(3). The presumption applies because there is probable cause to believe that the defendant committed:

> An offense involving a MINOR victim under 18 U.S.C. §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1), 2252(a)(2), 2252(a)(3), 2252A(a)(1), 2252A(a)(2), 2252A(a)(3), 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

The United States will not invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the safety of any other person and the community pursuant to 18 U.S.C. § 3142(e)(2).

4. Time for Detention Hearing

The United States requests the Court conduct the detention hearing at initial appearance.

The United States requests leave of Court to supplement this motion with additional grounds or presumptions for detention.

Dated: December 23, 2016.

Respectfully submitted,

JOHN A. HORN
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Certificate of Service

I served this document today by handing a copy to defense counsel:

December 23, 2016

/s/JENNIFER KEEN
JENNIFER KEEN
Assistant United States Attorney